

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VOLTERRA SEMICONDUCTOR LLC,)
Plaintiff,) C.A. No. 19-02240-CFC
v.)
MONOLITHIC POWER SYSTEMS, INC.,)
Defendant.)
JURY TRIAL DEMANDED
Redacted:
Public Version

**DECLARATION OF JINGHAI ZHOU IN SUPPORT OF DEFENDANT
MONOLITHIC POWER SYSTEMS, INC.'S
MOTION TO STRIKE THE FIRST AMENDED COMPLAINT**

1. I, Jinghai Zhou, am a Senior Director of the Cloud Computing Product Line for Monolithic Power Systems, Inc. (“MPS”), which includes many families of DC-to-DC power converter products. I have been employed by MPS since February 2006. In my role, among other responsibilities, I communicate regularly with customers about MPS products and opportunities to work together on products. I provide this declaration based on my personal knowledge and on behalf of MPS.

2.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] . Since this incident, I learned that these customers had been told that the scope of the litigation is much broader than the 48V-1V Power Solution offering, pointing to a press release Maxim issued on January 7, 2020. It appears Maxim intentionally confused MPS's customers about the scope of this litigation and the nature of the MPS products alleged to be infringing.

3. [REDACTED]

[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

4. Each product of the thousands of products within MPS's DC-to-DC power converter line of products employs its own unique design having structure, features, or operation that are different because each product is tailored for a different DC-to-DC power converter application.

5. I understand that Volterra (in paragraph 18 of the First Amended Complaint) states that the "48V-1V Power Solution for CPU, SoC or ASIC Controller" is a "non-exhaustive example" of the "Accused Products." [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

6. The foregoing is true and correct to the best of my knowledge.

Executed on May 29, 2020 at Santa Clara, California.



Dr. Jinghai Zhou